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October 31, 2024

## **VIA ECF**

Hon. Valerie Figueredo United States Magistrate Judge Daniel Patrick Moynihan Courthouse 500 Pearl Street, Room 1660 New York, New York 10007

Re: Courtalert.Com, Inc v. American Legalnet, Inc., et al.

No. 1:20-cv 07739 (VSB)(VF)

Dear Judge Figueredo:

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 11/1/24

elief requested herein is

The relief requested herein is GRANTED. The parties are directed to file a joint letter by **November 4, 2024.** 

MEMO ENDORSED

We represent Defendants American LegalNet, Inc. ("ALN"), Erez Bustan and Robert Loeb. A discovery conference is set for November 6, 2024, and the Court ordered the parties to submit a joint letter raising discovery disputes by November 1, 2024. (ECF Dkt. 110) We write to request that the Court extend the date for the letter to Monday, November 4, 2024. Plaintiff's counsel has indicated that they consent to this application.

The Court previously directed that the parties meet and confer on discovery disputes contained in prior letters. (ECF Dkt. 120) We held a meet and confer on Tuesday, but for a number of items, the response was that we should await Plaintiff's next document production. That only took place late today. We have not had a chance to review these documents nor complete the meet and confer.

In addition, Plaintiff served responses to new document requests and interrogatories, for which we believe there will be disputes. Plaintiff indicated its availability to meet and confer on Monday.

Accordingly, we believe this minor extension will allow us to confer on all outstanding disputes and then raise them with the Court for the November 6 conference. We accordingly request that the within application be granted.

Respectfully Submitted,

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cc: All counsel (ECF)